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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES, AND TOXIC SUBSTANCES

Note to Reader August 7, 1998

Background: As part of its effort to involve the public in the implementation of the Food Quality Protection Act of 1996 (FQPA), which is designed to ensure that the United States continues to have the safest and most abundant food supply, EPA is undertaking an effort to open public dockets on the organophosphate pesticides. These dockets will make available to all interested parties documents that were developed as part of the U.S. Environmental Protection Agency's process for making reregistration eligibility decisions and tolerance reassessments consistent with FQPA. The dockets include preliminary health assessments and, where available, ecological risk assessments conducted by EPA, rebuttals or corrections to the risk assessments submitted by chemical registrants, and the Agency's response to the registrants' submissions.

The analyses contained in this docket are preliminary in nature and represent the information available to EPA at the time they were prepared. Additional information may have been submitted to EPA which has not yet been incorporated into these analyses, and registrants or others may be developing relevant information. It's common and appropriate that new information and analyses will be used to revise and refine the evaluations contained in these dockets to make them more comprehensive and realistic. The Agency cautions against premature conclusions based on these preliminary assessments and against any use of information contained in these documents out of their full context. Throughout this process, if unacceptable risks are identified, EPA will act to reduce or eliminate the risks.

There is a 60 day comment period in which the public and all interested parties are invited to submit comments on the information in this docket. Comments should directly relate to this organophosphate and to the information and issues

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available in the information in this docket. Once the comment period closes, EPA will review all comments and revise the risk assessments, as necessary.

These preliminary risk assessments represent an early stage in the process by which EPA is evaluating the regulatory requirements applicable to existing pesticides. Through this opportunity for notice and comment, the Agency hopes to advance the openness and scientific soundness underpinning its decisions. This process is designed to assure that America continues to enjoy the safest and most abundant food supply. Through implementation of EPA's tolerance reassessment program under the Food Quality Protection Act, the food supply will become even safer. Leading health experts recommend that all people eat a wide variety of foods, including at least five servings of fruits and vegetables a day.

Note: This sheet is provided to help the reader understand how refined and developed the pesticide file is as of the date prepared, what if any changes have occurred recently, and what new information, if any, is expected to be included in the analysis before decisions are made. It is not meant to be a summary of all current information regarding the chemical. Rather, the sheet provides some context to better understand the substantive material in the docket (RED chapters, registrant rebuttals, Agency responses to rebuttals, etc.) for this pesticide.

Further, in some cases, differences may be noted between the RED chapters and the Agency's comprehensive reports on the hazard identification information and safety factors for all organophosphates. In these cases, information in the comprehensive reports is the most current and will, barring the submission of more data that the Agency finds useful, be used in the risk assessments.

Mack Housenger, Acting Director Special Review and Reregistration

Division

Mr. Brent Solomon Valent USA Corp. 1401 Eye Street, N.W. Suite 220 Washington, DC 20005

SUBJECT: NALED: The HED Chapter of the Reregistration Eligibility Decision Document

(RED) for Naled (Case 0092)

Dear Mr. Solomon:

The Agency is in the process of revising the Human Health Assessment chapter for use in the Reregistration Eligibility Decision (RED) for Naled. A copy of the analyses completed July 13, 1995, are enclosed for your use.

The Agency provided Valent with the major components of the risk assessment in 1995. Valent submitted comments and incorporated several risk mitigation measures in response to this assessment. Because the Agency previously provided you with essentially the same assessment contained in the attached chapter and you have responded and provided mitigation measures in response to the Agency's assessment, EPA believes that Valent can reasonably identify gross errors in the enclosed chapter by August 10, 1998. Please keep in mind that the revised human health assessment will be sent to you for comment once it is complete.

If you have any questions or comments or questions, please contact Diane Isbell at (703) 308-8154.

Sincerely,

Kathy S. Monk, Chief Reregistration Branch II Special Review and Reregistration Division (7508W)

Enclosure